

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

v.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv563-TSE-TCB

DEFENDANTS' WITNESS LIST

Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc., by counsel and in accordance with Fed. R. Civ. P. 26(a)(3)(A)(i), submit their list of witnesses¹ as follows:

Defendants expect to call the following witnesses:

1. Albert J. Dwoskin
2. Josephine Giambanco
3. Carolina Easton
4. Peter Williams*
5. Mark Jones
6. Daniel H. Weinberg
7. George C. Caruso
8. Valerie Dixon
9. Rosy Giron de Reyes*
10. Jose Dagoberto Reyes*

¹ An asterisk next to any witness' name indicates that, pursuant to Fed. R. Civ. P. 26(a)(3)(A)(i), the witness will be called only in the event he or she is needed.

11. Felix Alexis Bolanos*
12. Ruth Rivas*
13. Yovana Jaldin Solis*
14. Esteban Ruben Moya Yrapura*
15. Rosa Elena Amaya*
16. Herbert David Saravia Cruz*

In addition to the persons listed above, Defendants reserve the right to call as a witness any person identified on Plaintiffs' Witness List and not objected to by Defendants, and to call such additional witnesses for the purposes of impeachment or rebuttal as the Defendants deem appropriate.

Dated: December 4, 2020

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, WAPLES PROJECT LIMITED
PARTNERSHIP AND
A. J. DWOSKIN & ASSOCIATES, INC.

/s/

Grayson P. Hanes (VSB #06614)
Michael S. Dingman (VSB #30031)
Justin deBettencourt (VSB #83806)
7900 Tysons One Place
Suite 500
McLean, Virginia 22102
(703) 641-4200 (Telephone)
(703) 641-4340 (Facsimile)
ghanes@reedsmith.com
mdingman@reedsmith.com
jdebettencourt@reedsmith.com
Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of December, 2020, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/

Grayson P. Hanes (VSB #06614)
Michael S. Dingman (VSB #30031)
Justin deBettencourt (VSB #83806)
7900 Tysons One Place
Suite 500
McLean, Virginia 22102
(703) 641-4200 (Telephone)
(703) 641-4340 (Facsimile)
ghanes@reedsmith.com
mdingman@reedsmith.com
jdebettencourt@reedsmith.com